



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP 28 2012

Mr. John J. Donahue
Superintendent
Delaware Water Gap National Recreation Area &
Middle Delaware National Scenic and Recreational River
HQ River Road, off Rt. 209
Bushkill, PA 18324

Dear Superintendent Donahue:

The Environmental Protection Agency's (EPA) Regions 2 and 3 have reviewed the National Park Service's (NPS) Final Environmental Impact Statement (FEIS) for the Susquehanna to Roseland 500-kV Transmission Line Right-of-Way and Special Use Permit.

PPL Electric Utilities Corporation and Public Service Electric and Gas Company (the applicant) owns and operates an existing 230-kV line with a right-of-way (ROW) ranging from 100 to 380 feet wide through the Delaware Water Gap National Recreation Area, Appalachian National Scenic Trail and Middle Delaware National Scenic and Recreational River in Pennsylvania and New Jersey. The applicant is seeking to increase its transmission capabilities by replacing the existing 230-kV line with a 500-kV line as well as adding an additional 500-kV line. The FEIS addresses that portion of the Susquehanna to Roseland transmission line that passes through the National Park system. Accordingly, the FEIS's evaluation is limited to the applicant's request to construct a double 500-kV power line across three units of the National Park system and examines how the proposed project would affect the purposes and resources of the Park units. The applicant's final construction plan proposes to utilize the existing ROW, access the ROW through existing natural and cultural areas, construct new and taller power line towers and remove and replace the existing 230-kV line with a 500-kV power line as well as an additional 500-kV line.

The National Park Service has identified alternative 2, the applicant's proposed alternative along the existing ROW, as the preferred alternative, with the incorporation of critical mitigation measures. At the time of our review of the Draft EIS, EPA expressed environmental objections to this alternative based on our concerns regarding indirect wetlands and groundwater impacts due to blasting, wetlands impacts due to vegetation


removal and temporary road access, wetlands mitigation, and issues concerning the width of the ROW. We also commented on air emissions, water quality, and environmental justice. The information in the FEIS adequately addresses many of these comments, and removes EPA's objection to the preferred alternative, since:

- Tower foundations will be constructed using only drilling techniques, not blasting as proposed in the Draft EIS.
- Wetland impacts have been minimized, primarily due to the use of drilling and the elimination of a proposed access road in the Arnot Fen. Wetland mitigation measures have been identified in the Draft Wetland and Floodplains Statement of Findings for the Susquehanna to Roseland 500 kV Transmission Line issued July 2012.
- The applicants have stated in their January 30, 2012, comment letter that only .76 miles of the ROW will be cleared an additional 50 feet.

However, we still have concerns with regard to the mitigation plan and the incorporation of the Statement of Findings into the FEIS. These areas are discussed in our attached comments.

Thank you for the opportunity to comment on this FEIS. If you have any questions, please call Lingard Knutson of my staff at (212) 637-3747.

Sincerely,



Judy-Ann Mitchell, Chief
Sustainability and Multimedia Programs Branch
Clean Air and Sustainability Division

Enclosure

cc: B. Rudnick, Region 3
A. Degeorio, Region 3
M. Roundtree, Headquarters

EPA Technical Comments

National Park Service Final EIS Susquehanna to Roseland 500-KV Transmission Line Right-of-Way and Special Use Permit

1. Mitigation Plans. The applicant has proposed compensation in the form of land purchases and the creation of a mitigation fund to be administered by The Conservancy. While these efforts are discussed in the applicant's letter January 30, 2012 (Appendix L) and the applicants May 25, 2012 Plan for Compensatory Mitigation (Appendix N), EPA understands that the details of these plans could not be included in the FEIS. The details and final agreements should be included in the Record of Decision to be legally binding, and insure appropriate mitigation for the project.
2. Monitoring Plans. While the applicant has agreed to construct the foundations of the towers by drilling, EPA still has some concerns about the possible effects of drilling on Arnott Fen. There is some information included in Appendix F, however additional information on adaptive management strategies during construction (should monitoring provide information that drilling is affecting the groundwater flow through Arnott Fen) would have given the public more information, and more confidence in protection of the Fen during construction.
3. Endangered Species Act Consultation: Chapter 5 of the FEIS states that the Section 7 consultation with the Fish and Wildlife Service is still ongoing. As parts of the study area are important habitat for the bog turtle (*Clemmys muhlenbergii*), including the complete consultation in the FEIS would have been useful to the public in determining the project's full impact to endangered species.
4. EPA can find no responses in the FEIS to our comments (Dated January 31, 2012) on air quality, or inclusion of the Water Erosion Prediction Project model projections in the FEIS. In addition, our comments on environmental justice were not addressed.